

STONE MAGNANINI

COMPLEX LITIGATION

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July 20, 2022

VIA ELECTRONIC FILING

Hon. Analisa Torres, U.S.D.J.

Daniel Patrick Moynihan

United States Courthouse

500 Pearl Street

New York, NY 10007

Re: U.S. ex rel. Criddle v. New York City Health and Hospitals Corp. et al.
Docket No. 1:19-cv-8281-AT

Dear Judge Torres:

My name is Robert A. Magnanini. I am a Managing Partner with the law firm of Stone & Magnanini LLP, counsel for Plaintiff-Relator Thalia-Rae Criddle in the above-referenced matter. I am writing Your Honor this correspondence with respect to the Order entered by the Court on July 11, 2022. Pursuant to the Court's Order, the Parties were required to file a jointly-proposed Case Management Plan and Scheduling Order on July 7, 2022, but failed to do so. Accordingly, the Parties are now required to file same by July 25, 2022.

In order to avoid the appearance of recalcitrance on the part of the Parties, we wish to inform Your Honor of the current status of this matter. Pursuant to the Order entered by the Court on March 29, 2022, the seal in this matter was to be lifted on April 28, 2022. Pursuant to ninety-day period for service of the Complaint under Fed. R. Civ. P. 4, Relator must serve Defendants with a copy of the Summons and Complaint by July 27, 2022. As of this correspondence, Relator has not yet served Defendants with the Summons and Complaint, and no Counsel has entered an appearance on behalf of Defendants. While we had been in discussions with Counsel for Defendants to seek an efficient and amicable resolution to Relator's claim without protracted litigation, Counsel for Defendants has not replied to any of our subsequent communications. Accordingly, we have requested Summonses and are in the process of Serving Defendants with the Complaint.

In addition, as the Parties will need time to confer on the scheduling of this case upon service of the Complaint, we respectfully request that the Court adjourn the deadline for the Parties to file the joint Case Management Plan and Scheduling Order until Defendants have been served, and Counsel for Defendants has entered an appearance in this matter. This is Plaintiff's first request for an adjournment of the Court's schedule.

GRANTED in part, DENIED in part. By **September 27, 2022**,
the parties shall file their joint letter and proposed case
management plan.

SO ORDERED.

Dated: July 22, 2022

New York, New York



ANALISA TORRES
United States District Judge